

1 J Christopher Jorgensen  
Nevada Bar No. 5382  
2 LEWIS ROCA ROTHGERBER CHRISTIE LLP  
3993 Howard Hughes Parkway, Suite 600  
3 Las Vegas, NV 89169  
Phone: (702) 949-8200  
4 Email: cjorgensen@lrrc.com  
*Attorneys for Defendant*  
5 *Barclays Bank Delaware*

6 David H. Krieger, Esq. (SBN: 9086)  
HAINES & KRIEGER, LLC  
7 8985 S. Eastern Avenue, Suite 350  
Henderson, Nevada 89123  
8 Phone: (702) 880-5554

9 Michael Kind, Esq. (SBN: 13903)  
KAZEROUNI LAW GROUP, APC  
10 6069 South Fort Apache Road, Suite 100  
Las Vegas, Nevada 89148  
11 Phone: (800) 400-6808 x7  
mkind@kazlg.com

12 *Attorneys for Plaintiff*  
13 *Virginia Sielaw*

14 **UNITED STATES DISTRICT COURT**  
15 **DISTRICT OF NEVADA**

16 Virginia Sielaw,

17 Plaintiff,

18 vs.

19 Ally Financial f/k/a GMAC Automotive  
Bank, Barclays Bank Delaware, Equifax  
20 Information Services LLC and Trans  
Union LLC,

21 Defendants.  
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Case No.: 2:17-cv-02045-APG-NJK

**STIPULATION TO EXTEND  
DEFENDANT BARCLAYS BANK  
DELAWARE'S TIME TO RESPOND  
TO AMENDED COMPLAINT**

**(SECOND REQUEST)**

Compl. Filed: July 27, 2017  
Amend. Comp. Filed: August 28, 2017

Hon. Judge Andrew P. Gordon  
Hon. Magistrate Judge Nancy J. Koppe

1 This second Stipulation to Extend Time to Respond to Amended Complaint is  
2 made by and between Plaintiff Virginia Sielaw (“Plaintiff”) and Defendant Barclays  
3 Bank Delaware (“Barclays”) through their respective counsel, in light of the following  
4 facts:

5 RECITALS

6 A. Plaintiff filed the Complaint (“Complaint”) against Barclays on or about  
7 July 27, 2017.

8 B. Plaintiff filed the Amended Complaint (“Amended Complaint”) against  
9 Barclays on or about August 28, 2017.

10 C. Pursuant to the Parties’ first stipulated request to extend Barclays’  
11 deadline to respond to the Amended Complaint, the Court ordered that Barclays’ would  
12 have through September 18, 2017 to respond to the Amended Complaint in order to  
13 give Barclays time to investigate Plaintiff’s claims and prepare a proper response, and  
14 for the parties to discuss a potential resolution of this matter (Doc. 17).

15 D. The Parties require another brief extension in order to finalize their  
16 investigation of Plaintiff’s claims, which may result in resolution of this matter without  
17 resort to further litigation.

18 E. The Parties therefore stipulate and agree that Barclays’ has through  
19 October 2, 2017 to respond to the Amended Complaint in order to give the Parties time  
20 to investigate Plaintiff’s claims for the purpose of potentially resolving this matter  
21 without resort to further litigation.

22 F. There is good cause to grant this stipulation because the Parties require  
23 additional time to investigate Plaintiff’s claims for the purpose of considering an early  
24 resolution of this matter.

25 G. Pursuant to Local Rule IA 6-2 and Local Rule 7.1, Plaintiff and Barclays  
26 respectfully request that the Court extend Barclays’ time to respond to Plaintiff’s  
27 Amended Complaint through September 18, 2017.

1 STIPULATION

2 NOW, THEREFORE, Plaintiff and Barclays hereby stipulate and agree that  
3 Barclays has up to and including October 2, 2017, to file a response to Plaintiff's  
4 Amended Complaint.

5 **IT IS SO STIPULATED**

6  
7 DATED: September 14, 2017 LEWIS ROCA ROTHGERBER CHRISTIE LLP

8  
9 By: /s/ J Christopher Jorgenson  
10 J Christopher Jorgensen  
11 Attorneys for Defendant  
12 Barclays Bank Delaware

13  
14 DATED: September 14, 2017 KAZEROUNI LAW GROUP, APC

15 By: /s/ Michael Kind  
16 Michael Kind, Esq.  
17 Attorney for Plaintiff  
18 Virginia Sielaw

19 IT IS SO ORDERED.

20 Dated: September 15, 2017

21   
22 UNITED STATES MAGISTRATE JUDGE  
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